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September 22, 2023

VIA ECF

Honorable Nelson S. Román
United States District Court
Southern District of New York
White Plains, New York, 10601

Dated: September 22, 2023
White Plains, NY

SO ORDERED:

HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Re: *Spira v. TransUnion, LLC, et al.*
Case No. 7:23-cv-04319-NSR
LoanCare, LLC's Request to Stay Discovery

Dear Judge Román:

LoanCare, LLC requests a stay of discovery under Federal Rule of Civil Procedure 26(c) pending adjudication of its motion for judgment on the pleadings ("MJOP"), which is due to be filed November 6, 2023.

Previously, the CRA defendants requested a stay of discovery pending a determination of their own anticipated MJOPs. (ECF 43). The CRA defendants and Plaintiff subsequently entered into a stipulation to stay discovery pending adjudication of their MJOP (ECF 48), which this Court granted on September 18, 2023. (ECF 50).

Because the Court has also granted LoanCare's request to file a MJOP, with a filing deadline of November 6, 2023 (ECF 51), LoanCare respectfully requests that this Court enter an Order staying discovery pending adjudication of LoanCare's MJOP as well. LoanCare's counsel has requested that Plaintiff consent to the stay, but as of the date of this letter Plaintiff's counsel has not responded.

Respectfully submitted,

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September 22, 2023
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/s/Joseph M. DeFazio

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cc: All counsel of record (via ECF)